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WESLEY T HARLAN CLERK OF COURT

IN THE COMMON PLEAS COURT PERRY COUNTY, OHIO

HEATHER ANDERS
264 DRINLEY DRIVE
ZANESVILLE, OH 43701
Plaintiff

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PERRY COUNTY SHERIFF DEPARTMENT C/O SHERIFF WILLIAM BARKER 110 W. BROWN STREET NEW LEXINGTON, OH 43765

**AND** 

WILLIAM R. BARKER
SHERIFF OF PERRY COUNTY
110 W. BROWN STREET
NEW LEXINGTON, OH 43765

**AND** 

DEPUTY ANDREW LOVE PERRY COUNTY SHERIFF DEPARTMENT 110 W. BROWN STREET NEW LEXINGTON, OH 43765

Defendants.

VERIFIED MOTION FOR EX PARTE
ORDER FOR IMMEDIATE RETURN
OF PERSONAL PROPERTY; MOTION
FOR IMMEDIATE RETURN OF
RETURN OF PERSONAL PROPERTY

GOTTLIEB, JOHNSTON, BEAM & DAL PONTE, PLL

Attorneys At Law
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Zanesville, Ohio
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Now comes Plaintiff, by and through counsel, and does hereby move this Court for an *Ex Parte* Order and, subsequently, an Immediate Order in the event that the *ex parte* order is either granted or denied, for the return of specific items of personal property to the Plaintiff. The grounds for this motion and the specific personal property, are more fully

described in the attached copy of a Verified Complaint being filed at this time. The allegations set forth in the Complaint are incorporated herein by reference and for the sake of brevity will not be repeated herein.

Plaintiff has suffered and will continue to suffer irreparable harm in the event that her personal property is not returned to her forthwith. She may suffer the loss of a job, inability to transported herself, to purchase food or other necessary items as well as an inability to obtain medical care and treatment. In the event that the Court denies the request for ex parte relief, Plaintiff respectfully requests an expedited hearing on the motion.

RESPECTFULLY SUBMITTED

Miles D. Fries

(0016415)

Attorney for Plaintiff

GOTTLIEB, JOHNSTON, BEAM

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## **VERIFICATION**

I, Heather Anders, being first duly cautioned and sworn, state that the answers to the foregoing Interrogatories are true and correct to the best of my knowledge and belief.

NAME

STATE OF OHIO

SS

COUNTY OF MUSKINGUM

Sworn to and subscribed before me this 21th

day of September 2021, a Notary

Public for the State of Ohio, County of Muskingum.



LORI M SHOOK Notary Public State of Ohio My Comm. Expires July 11, 2026

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## **REQUEST FOR SERVICE**

Please issue a summons, a copy of the foregoing, upon the Defendants, Perry County Sheriff Department, c/o William Barker, William R. Barker, Sheriff of Perry County and Officer Brian Alexander at the addresses set forth above by personal service by process server Chris Wise and make the same returnable according to law.

Miles D. Fries

(0016415)

Attorney for Plaintiff

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